

Mendota Project Class VI Well Permit  
EPA Financial Responsibility Discussion  
Dec 15, 2020 Agenda 1 – 2 p.m. PST

Agenda Item		Lead	Estimated Time
1	Introductions	All	5 min
2	Refresh of project, background and meeting purpose	Rebecca	5 min
3	Proposed Mendota FR concept	Kevin & Rebecca	15 min
4	Discussion of concept and Q&A	All	30 min
5	Path forward, next steps and action items summary	Kevin & Rebecca	5 min

Schlumberger-Private



# Ex. 4 CBI

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# Mendota Project Class VI Well Permit

## EPA Financial Responsibility Discussion

### Other Considerations

- All Mendota FR security instruments will meet EPA requirements
  - Actively reviewing specifics of each with creditworthy providers
- Seeking EPA consideration of Pollution Legal Liability (PLL) insurance-type coverage and limits for Mendota Class VI well purposes
- Mendota is seeking the right to substitute FR security instruments over time to ensure:
  - Full project lifecycle funding
  - Security is sustainable and requirements can be met over many decades
  - Ready access to security in the unlikely event it is needed
  - Environmental and commercial success
- Expecting additional site-specific PISC and ERR information 1Q 2021

# Mendota Project Class VI Well Permit

## EPA Financial Responsibility Discussion

### Path forward, next steps and action items summary

- Seeking 2021 EPA feedback on Mendota concept in January 2021 on:
  - 2021 – 2022 amounts and types of FR security
    - Necessary to advance ongoing project development
  - Permit to Construct issuance based on Mendota meeting pre-agreed milestone-based timing and amounts of FR security
    - Mendota to meet each FR security posting “condition precedent” by each project milestone or permit is not valid and project may not advance
  - EPA approval of PLL insurance (form and amounts)
  - EPA approval of a phased pay-in concept into a Mendota trust fund
  - EPA approval of the project’s ability to substitute forms of FR security over time
    - So long as the new FR security meets EPA requirements for form and amount
  - How best to coordinate EPA with CARB, CalGEM and Water Control Boards?
- Expecting to share additional site-specific PISC and ERR information with EPA in 1Q 2021
  - Follow up meeting and additional documentation late 1Q 2021